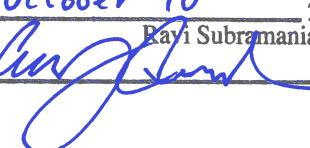


1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in the U.S.
4 DISTRICT COURT at Seattle, Washington.

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By  Ray Subramanian, Clerk
Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

NO. CR24-164 JNW

Plaintiff

SUPERSEDING INDICTMENT

v.

1. MARQUIS JACKSON,
2. MARKELL JACKSON,
3. MANDEL JACKSON,
4. EDGAR VALDEZ,
5. KEONDRE JACKSON,
6. MICHAEL YOUNG,
7. SIR TERRIQUE MILAM,
8. TYRELL LEWIS,
9. ROBERT JOHNSON,
10. MATELITA JACKSON,
11. MIRACLE PATU-JACKSON,
12. DIYANA ABRAHA,
13. ADEAN BATINGA,
14. TIANNA KARASTAN,
15. ROBERT BELLAIR,
16. RONALD FINKBONNER,
17. PATRICK JAMES,
18. THOMAS MORRIS,
19. CHAD CONTI, and
20. PHILLIP LAMONT ALEXANDER,

Defendants.

1 The Grand Jury charges that:

2 **COUNT 1**

3 **(Conspiracy to Distribute Controlled Substances)**

4 Beginning at a time unknown, and continuing until at least October 2, 2024, in
 5 King, Pierce, Snohomish, and Whatcom Counties, within the Western District of
 6 Washington, and elsewhere, MARQUIS JACKSON, MARKELL JACKSON, MANDEL
 7 JACKSON, EDGAR VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR
 8 TERRIQUE MILAM, TYRELL LEWIS, ROBERT JOHNSON, MIRACLE
 9 PATU-JACKSON, DIYANA ABRAHA, ADEAN BATINGA, TIANNA KARASTAN,
 10 ROBERT BELLAIR, RONALD FINKBONNER, PATRICK JAMES, THOMAS
 11 MORRIS, CHAD CONTI, PHILLIP LAMONT ALEXANDER, and others known and
 12 unknown, did knowingly and intentionally conspire to distribute controlled substances,
 13 including: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), N-(4-
 14 fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (p-fluorofentanyl – a
 15 fentanyl analogue), and methamphetamine, substances controlled under Title 21, United
 16 States Code.

17 The Grand Jury further alleges that with respect to MARQUIS JACKSON,
 18 MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE
 19 JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS,
 20 ROBERT JOHNSON, ROBERT BELLAIR, RONALD FINKBONNER, PATRICK
 21 JAMES, THOMAS MORRIS, CHAD CONTI, and PHILLIP LAMONT ALEXANDER
 22 their conduct as members of the conspiracy charged in Count 1, which includes the
 23 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,
 24 involved 400 grams or more of a mixture or substance containing fentanyl, in violation of
 25 Title 21, United States Code, Sections 841(b)(1)(A).

The Grand Jury further alleges that with respect to MARQUIS JACKSON, MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS, and ROBERT JOHNSON, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved 100 grams or more of a mixture and substance containing a detectable amount of any fentanyl analogue, in violation of Title 21, United States Code, Sections 841(b)(1)(A).

The Grand Jury further alleges that with respect to EDGAR VALDEZ, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Sections 841(b)(1)(A).

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

COUNT 2

(Conspiracy to Commit Money Laundering)

A. The Conspiracy

Beginning at a time unknown, and continuing until at least October 2, 2024, in King, Pierce, Snohomish, and Whatcom Counties, within the Western District of Washington, and elsewhere, MARQUIS JACKSON, MARKELL JACKSON, MATELITA JACKSON, DIYANA ABRAHA, and others known and unknown, did knowingly combine, conspire, and agree with each other and with other persons known

1 and unknown to the Grand Jury to commit offenses against the United States in violation
 2 of Title 18, United States Code, Section 1956, to wit:

3 1. To knowingly conduct and attempt to conduct financial transactions
 4 affecting interstate commerce and foreign commerce, which transactions involved the
 5 proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled
 6 Substances as charged in Count 1, knowing that the transactions were designed in whole
 7 or in part to conceal and disguise the nature, location, source, ownership, and control of
 8 the proceeds of specified unlawful activity, and that while conducting and attempting to
 9 conduct such financial transactions, knew that the property involved in the financial
 10 transactions represented the proceeds of some form of unlawful activity, in violation of
 11 Title 18, United States Code, Section 1956(a)(1)(B)(i); and

12 2. To knowingly conduct and attempt to conduct financial transactions
 13 affecting interstate commerce and foreign commerce, which transactions involved the
 14 proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled
 15 Substances as charged in Count 1, knowing that the transactions were designed in whole
 16 or in part to avoid a transaction reporting requirement under State or Federal Law, and
 17 that while conducting and attempting to conduct such financial transactions, knew that
 18 the property involved in the financial transactions represented the proceeds of some form
 19 of unlawful activity, in violation of Title 18, United States Code, Section
 20 1956(a)(1)(B)(ii).

21 All in violation of Title 18, United States Code, Section 1956(h).

22 **COUNT 3**

23 **(Distribution of a Controlled Substance)**

24 On or about October 31, 2023, in Snohomish County, within the Western District
 25 of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown,
 26 did knowingly and intentionally distribute, and aid and abet the distribution of, a

1 controlled substance, including: fentanyl and p-fluorofentanyl (a fentanyl analogue),
2 substances controlled under Title 21, United States Code.

3 The Grand Jury further alleges that the offense involved 400 grams or more of a
4 mixture or substance containing fentanyl.

5 The Grand Jury further alleges that the offense involved 100 grams or more of a
6 mixture and substance containing a detectable amount of any fentanyl analogue.

7 The Grand Jury further alleges that this offense was committed during and in
8 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
9 Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 4

(Distribution of a Controlled Substance)

On or about December 7, 2023, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

21 The Grand Jury further alleges that this offense was committed during and in
22 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
23 Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(A), and Title 18, United States Code, Section 2

COUNT 5

(Distribution of a Controlled Substance)

On or about March 7, 2024, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, ADEAN BATINGA, ROBERT JOHNSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6

(Possession with Intent to Distribute a Controlled Substance)

On or about December 7, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, ROBERT BELLAIR, MARKELL JACKSON, and others known and known, did knowingly and intentionally possess, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 7**(Possession with Intent to Distribute a Controlled Substance)**

On or about February 9, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and 841(b)(1)(C).

COUNT 8**(Possession with Intent to Distribute a Controlled Substance)**

On or about July 22, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 9

(Possession with Intent to Distribute a Controlled Substance)

On or about August 21, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, PATRICK JAMES did knowingly and intentionally possess, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 10

(Possession with Intent to Distribute a Controlled Substance)

On or about October 4, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, THOMAS MORRIS did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 11**(Possession with Intent to Distribute a Controlled Substance)**

On or about October 2, 2024, in King County, within the Western District of Washington, and elsewhere, CHAD CONTI did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 12**(Possession with Intent to Distribute a Controlled Substance)**

On or about October 2, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, PHILLIP LAMONT ALEXANDER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 12 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

1 Upon conviction of any of the offenses alleged in Counts 1, and 3 through 12,
 2 MARQUIS JACKSON, MARKELL JACKSON, MANDEL JACKSON, EDGAR
 3 VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM,
 4 TYRELL LEWIS, ROBERT JOHNSON, MIRACLE PATU-JACKSON, DIYANA
 5 ABRAHA, ADEAN BATINGA, TIANNA KARASTAN, ROBERT BELLAIR,
 6 RONALD FINKBONNER, PATRICK JAMES, THOMAS MORRIS, CHAD CONTI,
 7 and PHILLIP LAMONT ALEXANDER shall forfeit to the United States, pursuant to
 8 Title 21, United States Code, Section 853(a), any property constituting or derived from
 9 proceeds traceable to the offense, as well as any property used or intended to be used to
 10 facilitate the offense. Such property includes, but is not limited to:

- 11 a. Approximately \$25,000 in U.S. currency, seized on or about August 18, 2024,
 12 from EDGAR VALDEZ's residence in Phoenix, Arizona;
- 13 b. Two Rolex watches, seized on or about August 18, 2024, from EDGAR
 14 VALDEZ's residence in Phoenix, Arizona;
- 15 c. One gold necklace, seized on or about August 18, 2024, from EDGAR
 16 VALDEZ's residence in Phoenix, Arizona; and
- 17 d. One black Ruger LCP, and any associated ammunition, seized on or about
 18 August 18, 2024, from a residence used by EDGAR VALDEZ, in Avondale,
 19 Arizona.

20 Upon conviction of the offense alleged in Count 2, MARQUIS JACKSON,
 21 MARKELL JACKSON, MATELITA JACKSON, and DIYANA ABRAHA, shall forfeit
 22 to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any
 23 property, real or personal, involved in the offense, or any property traceable to such
 24 property.

Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

A TRUE BILL: yes
DATED: 10/10/2024

Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.

FOREPERSON

TESSA M. GORMAN
United States Attorney

VINCENT T. LOMBARDI
Assistant United States Attorney

ZACHARY W. DILLON
Assistant United States Attorney